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NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
Leed Environmental, Inc.
124 Deborah Drive
Reading, PA 19610
Telephone: 610/670-7310
Telecopy: 610/670-7311

April 2, 2004

First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Operation and Maintenance Inspection (March 22, 2004)

Dear Mr. Bradley:

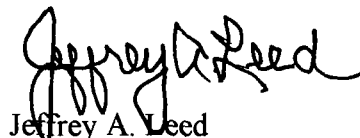
On March 22, 2004, ENTACT conducted an operation and maintenance inspection at the NL Industries/Taracorp Superfund Site on behalf of the NL/Taracorp Superfund Site Group ("Group"). A copy of ENTACT's O&M log sheet, documenting the results of the inspection, is attached for your records.

As you know, the Group has authorized ENTACT to perform maintenance activities at the site. ENTACT is scheduled to repair the erosion areas on the Taracorp pile cap as soon as weather conditions allow ENTACT to perform that work.

Please contact this office if additional information or clarification is required at this time.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

attachment

cc: Ms. Sandra Bron - Illinois EPA (w/attachment, by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(w/attachment, by first class mail)



**NL Industries/Taracorp Superfund Site
O & M Inspection Log**

Inspector: Caroline Panico

Date of Inspection: Monday, March 23, 2004

| Site Structure | Inspected (Yes/No) | Inspection Observations | Maintenance Work Required or Performed |
|---|-----------------------|---|---|
| Security Fence: | | | |
| • Gates/locks secure and operative | Y | State Street gate was unlocked. Chain and lock were missing. West gate locked and in good condition. | Replaced chain and lock on State Street gate at time of inspection. |
| • Evidence of rust, cuts, deterioration | Y | None | |
| • Evidence of unauthorized entry | Y | None | |
| • Burrowing or tunneling under fence | Y | None | |
| • Damaged barbed wire | Y | | |
| • Comments | | Fence pole bent on west side. May have been backed into from neighboring operations. No breach or damage to the fence fabric. | Check condition during next inspection |
| Access Road: | | | |
| • Evidence of settlement or deterioration | Y | None | |
| • Comments | | | |
| Landfill Cover – Vegetation | | | |
| • Establishment of grass from initial seeding | Y | 100% coverage | |
| • Adequate growth of vegetation | Y | Brown/yellow vegetation. Approximately 36" high | |
| • Evidence of stress | Y | None | |
| • Presence of trees/shrubs | Y | Some small trees on northeast corner. See photos | |
| • Need for mowing/maintenance | Y | Will need spring mowing | |
| • Comments | | | |
| Landfill Cover – Erosion | | | |
| • Evidence of erosion | Y | Yes. | |
| • Indicate areal extent and location | | 6 locations on west side slope with erosion from top of slope to mid slope or toe of slope. | Recommend maintenance to prevent further erosion. |
| • Comments | | | |
| Landfill Cover – Settlement | | | |
| • Evidence of settlement | Y | None. | |
| • Indicate areal extent and location | N/A | | |
| • Comments | | | |
| Landfill Cover – Cracks | | | |
| • Evidence of cracks | Y | Erosion listed above. Erosion crack widths vary from 6 inches to 12 inches and depths of 6 inches to 36 inches. | Recommend maintenance to prevent further erosion. |
| • Indicate areal extent and location | | Most severe erosion on the west side slope from top of slope down to concrete channel. | Recommend maintenance to prevent further erosion. |
| • Comments | | | |

| Site Structure | Inspected (Yes/No) | Inspection Observations | Maintenance Work Required or Performed |
|--|-----------------------|---|--|
| Landfill Cover – Bulges | | | |
| • Evidence of bulges | Y | None. | |
| • Indicate areal extent and location | N/A | | |
| • Comments | | | |
| Landfill Cover – Ponding | | | |
| • Evidence of ponding | Y | None. | |
| • Indicate areal extent and location | N/A | | |
| • Comments | | | |
| Landfill Cover – Seeps | | | |
| • Evidence of seepage (leachate) | Y | None. | |
| • Indicate areal extent and location | N/A | | |
| • Comments | | | |
| Landfill Cover – Slope Stability | | | |
| • Evidence of sliding | Y | None. | |
| • Indicate areal extent and location | N/A | | |
| • Comments | | | |
| Leachate Management System | | | |
| • Riser pipe and locks | Y | Riser pipe and cap in good condition. No lock on cap. | |
| • Leachate levels in sump | N | | |
| • Necessary sampling activities | N | | |
| • Necessary leachate disposal | N | | |
| • Comments | | | |
| Concrete Drainage Channel | | | |
| • Evidence of cracks or obstructions | Y | No visible cracks. Minimal obstructions from erosion/run-off sediment. (see photos) | Recommend sweeping/pressure washing of concrete channel after erosion repair are made. |
| • Areas of erosion | Y | None. | |
| • Comments | | | |
| Asphalt Covers - Integrity | | | |
| • Evidence of broken asphalt or fissures | Y | None. | |
| • Indicate areal extent and location | N/A | | |
| • Comments | | | |

Additional notes:

- Buildings in the northeast corner of the site have been demolished and all debris removed
- Damaged fence in northeast corner noted during last inspection has been repaired.
- A new lock and chain were placed on the State Street entrance at the time of the inspection
- Photos taken during inspection attached

NL/Taracorp Site
O&M Inspection Photographs
March 22, 2004



Photograph 1
Concrete drainage channel at southwest corner of site, damaged fence and pole



Photograph 2
Concrete drainage channel along north side of site



Photograph 3
Taracorp pile cap,
middle of west side slope erosion

**NL/Taracorp Site
O&M Inspection Photographs
March 22, 2004**



Photograph 4
Taracorp pile cap,
middle of east slope,
toe to top

Photograph 5
Rip rap at end of
drainage channel at
northeast corner of site



Photograph 6
Rip rap at end of
drainage channel at
southeast corner of
site

**NL/Taracorp Site
O&M Inspection Photographs
March 22, 2004**



Photograph 7
Taracorp pile cap,
southwest side slope
erosion



Photograph 8
Taracorp pile cap,
Southwest side slope erosion 2



Photograph 9
Taracorp pile cap,
southwest side slope erosion 3

**NL/Taracorp Site
O&M Inspection Photographs
March 22, 2004**



Photograph 10
Top of cap facing
northeast corner of site
(showing area where
former BV&G Trucking
buildings were demolished)

Photograph 11
Taracorp pile cap,
top of cap facing north



Photograph 12
Taracorp pile cap,
top of cap facing south

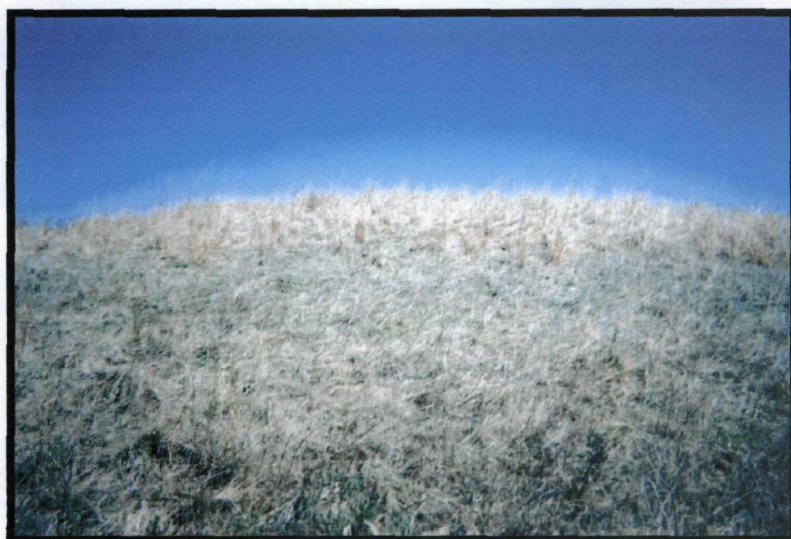
**NL/Taracorp Site
O&M Inspection Photographs
March 22, 2004**



Photograph 13
Taracorp pile cap,
tree growth on northeast corner



Photograph 14
Taracorp pile growth, vegetation facing northeast



Photograph 15
Taracorp pile cap,
vegetation on south slope

**NL/Taracorp Site
O&M Inspection Photographs
March 22, 2004**



**Photograph 16
Taracorp cap, west slope erosion
and sediment in concrete drain**